

# **Exhibit A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION  
CIVIL ACTION NO. 3:21-cv-03302-JMC-TJH-RMG

THE SOUTH CAROLINA STATE )  
CONFERENCE OF THE NAACP, )

and )

TAIWAN SCOTT, on behalf of )  
himself and all other similarly )  
situated persons, )

Plaintiffs, )

v. )

HENRY D. MCMASTER, in his )  
official capacity as Governor )  
of South Carolina; THOMAS C. )  
ALEXANDER, in his official )  
capacity as President of the )  
Senate; LUKE A. RANKIN, in his )  
official capacity as Chairman )  
of the Senate Judiciary )  
Committee; JAMES H. LUCAS, in )  
his official capacity as Speaker )  
of the House of Representatives; )  
CHRIS MURPHY, in his official )  
capacity as Chairman of the )  
House of Representatives )  
Judiciary Committee; WALLACE )  
H. JORDAN, in his official )  
capacity as Chairman of the )  
House of Representatives )  
Elections Law Subcommittee; )  
HOWARD KNAPP, in his official )  
capacity as interim Executive )  
Director of the South Carolina )  
State Election Commission; JOHN )  
WELLS, Chair, JOANNE DAY, )  
CLIFFORD J. EDLER, LINDA MCCALL, )  
and SCOTT MOSELEY, in their )  
official capacities as members )  
of the South Carolina Election )  
Commission, )

Defendants. )

**CONTINUED DEPOSITION**

**OF**

**BRENDA MURPHY**

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, the within continued deposition of **Brenda Murphy**, appearing via Zoom, was taken by Counsel for Defendants James H. Lucas, Chris Murphy, and Wallace H. Jordan, at the hour of 10:14 a.m. on Thursday, April 14, 2022, at the law offices of Nexsen Pruet, LLC, 1230 Main Street, Suite 700, Columbia, South Carolina, attended by counsel as follows:

**JAN L. WHITWORTH  
VERBATIM REPORTER**

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## **WHITWORTH COURT REPORTING**

POST OFFICE BOX 551  
ROEBUCK, S.C. 29376  
864-494-2705

1 A. Yes.

2 Q. Okay. And have those been produced if they were  
3 responsive to our request to the best of your  
4 knowledge?

5 A. To the best of my knowledge, what was requested was  
6 produced.

7 Q. Okay. Have you looked for documents on your  
8 [brendamurph@gmail.com](mailto:brendamurph@gmail.com) account?

9 A. That was -- my gmail was provided in order for  
10 search to be done.

11 Q. Okay. So, you provided access to that account to  
12 your counsel ---

13 A. Yes.

14 Q. --- so that they could perform ---

15 A. Yes.

16 Q. --- a search?

17 A. Yes.

18 Q. Okay, thank you. And did you personally search that  
19 account, or did you depend on your attorneys to  
20 search that account once provided?

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21 A. I did not personally search it. The attorneys  
22 searched the account.

23 Q. Okay. And do you know which lawyers conducted that  
24 account? I don't want the details of what they did.  
25 I am just asking if you know which lawyers conducted

1           that search, to the best of your knowledge, and if  
2           you don't know, again, I probably didn't say this  
3           before, but if you don't know the answer to my  
4           question, I am not asking you to speculate. You can  
5           just tell me you don't know.

6           A. I do know him. His name was Adam -- I don't want to  
7           mispronounce his last name, but I do have -- you  
8           know, I know -- I know his name. I talked with him  
9           personally.

10          Q. Was it Adam Pergament from Arnold ---

11          A. Yes.

12          Q. --- & Porter?

13          A. Yes, Pergament.

14          Q. Okay. And is he the only one to your knowledge that  
15          performed that search, to your knowledge?

16          A. Yes.

17          Q. Okay.

18          A. To my knowledge.

19          Q. Okay. And do you know if any of your emails from  
20          that account have been produced to us in this

21          litigation?  
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22          A. What was given to me in discovery, I saw maybe a  
23          few, a couple emails, yes.

24          Q. Okay, all right. So, what about the account  
25          [murph547@aol.com](mailto:murph547@aol.com); does that account ---

1 A. No.

2 Q. --- belong to you, President Murphy?

3 A. No, that is my husband's email address.

4 Q. That is your husband's email address?

5 A. Yes.

6 Q. Do you use his email address; do you use ---

7 A. No, I do not use that. I only use  
8 [brendacmurph@gmail.com](mailto:brendacmurph@gmail.com) for any business that I  
9 transacted at home during COVID.

10 Q. Okay.

11 A. I did not use murph.

12 Q. Okay. Do you know, President Murphy, if there has  
13 sort of been any comparison of your production to  
14 the production that we have received from other  
15 entities such as the League of Women Voters? Do you  
16 know that?

17 A. No, I don't; I don't know that.

18 Q. Okay. Are you aware that we issued a subpoena to  
19 the League of Women Voters, and they made a very  
20 fulsome document production to us, which was

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21 provided to your counsel in discovery?

22 A. No, I don't know that.

23 Q. Okay. I believe -- do you know if there are emails  
24 that were produced by the League of Women Voters  
25 that were produced to them -- by them including